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July 1, 2025

## VIA ECF

The Honorable Robyn F. Tarnofsky  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

*Re: Doe v. Columbia University*, No. 25-cv-02132-DEH-RFT (S.D.N.Y.)

Dear Judge Tarnofsky:

Pursuant to the Court's case management order, *see* ECF 52 at 5, the parties in the above-captioned action write jointly, to respectfully provide an update on the status of discovery. The parties state as follows:

***Initial Disclosures.*** On June 20, 2025, the parties exchanged initial disclosures. *See id.* at 3.

***Third Party Discovery.*** On June 24, 2025, Defendant Columbia University sent modified No Contact Directives to Plaintiff, and to counsel for Jane Roe and Mack Roe. *See* ECF 71. Defendant Columbia University also provided Plaintiff with a copy of the modified No Contact Directives that were sent to counsel for Jane Roe and Mack Roe.

***Initial Discovery Requests.*** On June 27, 2025, the parties exchanged initial requests for production and initial sets of interrogatories. *See* ECF 52 at 4. Also on June 27, 2025, Plaintiff served Defendant Columbia University with initial requests for admission.

***Protective Order.*** The parties have exchanged edits on a proposed protective order and continue to work to address remaining disagreements. The parties intend to meet and confer (and hopefully finalize) the protective order this week. In light of the holiday and attorney travel, the parties expect to submit a protective order to the Court, consistent with Rule II.D of Your Honor's Individual Practices in Civil Cases, next week, the week of July 7, 2025.

***ESI Protocol.*** The parties are still negotiating an ESI Protocol and plan to meet and confer this week. Pursuant to the Court's case management order, the parties expected to have an ESI Protocol in place on July 7, 2025. *See* ECF 52 at 5. In light of the holiday and attorney travel, the parties request a brief 1 week extension to submit the ESI Protocol to the Court, or until July 14, 2025. This is the first request for an extension of this deadline.

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At this time, the parties are meeting and conferring in good faith and working to avoid the need for the Court's intervention in the parties' protective order or ESI Protocol negotiations.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Anna Collins Peterson", with a stylized flourish at the end.

Anna Collins Peterson